

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:14CR00088 RWS (SPM)
)	
DIONNE GATLING, et al.,)	
)	
Defendants.)	

GOVERNMENT'S REQUEST FOR LEAVE TO FILE OUT OF TIME
ITS REQUEST FOR ADDITIONAL TIME TO RESPOND TO
DEFENDANT'S PRE-TRIAL MOTIONS

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Dean R. Hoag and Michael A. Reilly, Assistant United States Attorneys for said District, and requests leave to file this motion out of time and requests additional time to respond to defendants' pre-trial motions. The Government, in support of its motion, states as follows:

1. The Government's response to defendants' pre-trial motions was due July 6, 2015. Inadvertently, the Government missed the date in filing a motion for extension of time. Government's counsel apologizes for this error.
2. This case was deemed complex by this Court on April 9, 2014.
3. AUSAs Hoag and Reilly became part of this case's prosecution team in April and May of 2015, respectively. However, the case was fully re-assigned to them in June of 2015.
4. Defendants Gatling, T. Rush, A. Rush and Gibbs have individually filed motions to suppress statements and electronic evidence/wiretap evidence, as well as motions for Franks hearings. [Doc #s 145, 153, 156, 164, 167, 173 and 175]

5. Due to the complexity of this case, as well as the ongoing demands of their workloads, Government's counsel requests an additional three weeks to allow for time to accurately and fully respond to defendants' pre-trial motions.

WHEREFORE, the Government respectfully requests additional time, up to and including July 27, 2015, in which to file its response to defendants' pre-trial motions.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Dean R. Hoag
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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2015, the foregoing was filed electronically with the Clerk of the Court and was served by mail via the United States Postal Service to the following non-participant(s) in Electronic Case Filing:

All Attorneys of Record.

s/ Dean R. Hoag

DEAN R. HOAG, #23843MO

MICHAEL A. REILLY, #43908MO

Assistant United States Attorneys